

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED NOV 2 a 2000 CLERK, U.S. DISTRICT COURT By <u>[Signature]</u> Deputy
--

STEPHEN B. JONES, et al,

Plaintiffs,

GOVERNOR GEORGE W. BUSH
in his capacity as Candidate for
President, et al,

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO.
3:00-CV-2543-D

**PLAINTIFFS' APPENDIX IN SUPPORT
OF THEIR APPLICATION FOR PRELIMINARY INJUNCTION**

James A. Jones (TX Bar No. 10908300)
JONES & ASSOCIATES, P.C.
5015 Tracy, Suite 100
Dallas, TX 75205
(214) 219-3456
(214) 219-9309 (fax)

William K. Berenson (TX Bar No. 02184500)
LAW OFFICES OF WILLIAM K. BERENSON, P.C.
1701 River Run, Suite 900
Fort Worth, Texas 70107
(817) 805-8000

Prof. Sanford V. Levinson
University of Texas School of Law
727 East Dean Keeton St.
Austin, Texas 78705
(512) 232-1351

Charles W. McGarry (TX Bar No. 13610650)
LAW OFFICE OF CHARLES McGARRY
900 Jackson Street, Suite 600
Dallas, Texas 75202
phone: (214) 748-0800
fax: (214) 712-9254

ATTORNEY FOR PLAINTIFFS

24

APPENDICES

1. Defendant Richard B. Cheney’s Response and Objections to First Combined Set of Interrogatories and Requests for Admissions to Defendant Richard B. Cheney	A1
2. Certified Tax Appraisal Record	A10
3. Certified Voting History Report	A14
4. Certified Voting History Report	A19
5. Affidavit of Ann Huebner	A23
6. Response of Defendant Governor George W. Bush and Richard B. Cheney to the Court’s Order of November 22, 2000.	A30

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN E. JONES, LINDA D.
LYDIA, and CAROLINE FRANCO,
as Texas registered voters,

Plaintiffs,

v.

GEORGE W. BUSH, RICHARD B.
CHENEY, ERNIE ANGELO,
GAYLE WEST, BETTY R. HINES,
JAMES B. RANDALL, HELEN
QUIDAM, HENRY W. TEICH, Jr.,
WILLIAM EARL JUETT, HALLY B.
CLEMENTS, HOWARD PEBLEY, Jr.,
ADAIR MARGO, TOM F. WARD, Jr.,
CAMRMEN P. CASTILLO, CHUCK
JONES, MICHAEL PADDIE, JAMES
DAVIDSON WALKER, JOSEPH L.
ONIELL III, BETSY LAKE, ROBERT
J. PEDEN, JIM HAMLIN, MARY E.
COWART, SUE DANIEL, JAMES R.
BATSSELL, LOYCE McCARTER,
MICHAEL DUGAS, NEAL J. KATZ,
MARY CEVERHA, CLYDE MOODY
SIEBMAN, RANDALL TYE THOMAS,
CRUZ G. HERNANDEZ, JOHN ABNEY
CULBERSON, STAN STANART, and
KEN CLARK,

Defendants.

CIVIL ACTION NO.

3:00-CV-2548-D

**DEFENDANT RICHARD B. CHENEY'S RESPONSE AND OBJECTIONS TO
FIRST COMBINED SET OF INTERROGATORIES
AND REQUESTS FOR ADMISSIONS TO DEFENDANT RICHARD B. CHENEY**

Pursuant to Rules 26, 33, and 36 of the Federal Rules of Civil Procedure, and this
Court's Order of November 27, 2000, Defendant Richard B. Cheney ("Respondent") hereby
responds to Plaintiffs' First Combined Set of Interrogatories and Requests for Admissions.

GENERAL OBJECTIONS

A. Respondent objects to each Request and Interrogatory that seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

B. Respondent objects to each instruction, definition, Request, and Interrogatory to the extent that it seeks to impose on him any obligations or responsibilities other than those mandated by the Federal Rules of Civil Procedure or the Rules or Orders of this Court.

C. Respondent objects to each Request and Interrogatory because they seek information that is not reasonably calculated to lead to admissible evidence relevant to the asserted fact issue in this case: that is, will Respondent be an inhabitant of the State of Texas on December 18, 2000 at the time the defendant Texas Electors cast their ballots for President and Vice President of the United States?

D. Respondent objects to each Request and Interrogatory on the grounds that this is a non-justiciable controversy, brought by plaintiffs wholly lacking in standing.

E. The objections stated above are hereby incorporated by reference to each and every instruction, definition, Request, and Interrogatory.

F. The responses hereto have been provided on twenty-four hours notice. They are made to the best of the Respondent's knowledge, information and belief at a time in which he has been charged with the responsibility to supervise the transition of government in Washington. Accordingly, he reserves the right to amend any answers if time permits and additional, material information comes to light.

INTERROGATORIES

Interrogatory No. 1

Identify by name of state and dates of inhabitation every state of which you contend you have been an inhabitant at any time during the time period January 1, 1996 to the present.

ANSWER:

Respondent objects to Interrogatory No. 1 to the extent that the term "inhabitation" is not defined. Notwithstanding and without waiving said objection, Respondent states that he maintained a residence and was employed in the State of Texas from January 1996 to July 2000. On or about July 21, 2000, Respondent declared his intention to return to his home state of Wyoming. Respondent thereafter registered to vote in the State of Wyoming, obtained his driver's license in that state and put his Texas residence up for sale.

Interrogatory No. 2

If you have changed the state of your inhabitation since January 1, 1996, please state all facts upon which you rely to support your allegation that you are/were an inhabitant of the subsequent state(s).

ANSWER:

Respondent objects to Interrogatory No. 2 to the extent it fails to define "inhabitation." Respondent further objects to this "contention interrogatory" to the extent that it purports to reverse the role and burdens of persuasion placed upon plaintiffs and defendants in this case. It is the plaintiffs who have made "allegations." Respondent has moved to dismiss on the grounds that the controversy is not properly before this Article III Court. Notwithstanding and without waiving said objections, material facts relevant to any factual inquiry include:

- (i) Respondent is registered to vote in the State of Wyoming and has voted in two elections in Teton County since July 2000.
- (ii) Respondent holds a driver's license issued by the State of Wyoming. At the time he obtained his license the State of Wyoming invalidated his previous license, which was issued by the State of Texas. The Texas license was perforated with the word "VOID" and is now unusable.
- (iii) On or about July 25, 2000, Respondent was requested by the United States Secret Service to designate his primary residence for purposes of Secret Service protection. He designated his home in Jackson Hole, Wyoming.
- (iv) Respondent retired from the Halliburton Corporation on August 16, 2000. Since his retirement, he has not been employed in the State of Texas.
- (v) During Respondent's tenure at Halliburton, he maintained a house in Dallas, Texas. Since August 2000, the house has been shown for sale both privately and publicly. The house is currently under a contract for sale.

Interrogatory No. 3

[As modified by the court:] Identify (by type of vehicle, make and model) all vehicles (automobiles, boats, motorcycles) currently owned or leased by you and for each:

- a) identify the state(s) in which such vehicle(s) have been registered by (or on behalf of) you;
- b) identify the date(s) of registration of each vehicle in each state; and,
- c) state the physical location (by city and state) of each such vehicle during the past thirty days.

ANSWER:

Respondent has a lease and/or ownership interest in the following vehicles:

- One Mercedes-Benz automobile registered in the State of Virginia in 1997. This automobile has been located in and around the State of Virginia and Washington, D.C. during the past thirty days.
- One Jeep Cherokee registered in the State of Wyoming in 1998. This automobile has been located in the State of Wyoming during the past thirty days.
- One Lexus automobile registered in the State of Texas in 1996. This automobile has been located in the State of Colorado since on or about November 11, 2000.
- One Cadillac automobile registered in the State of Texas in 1995. This automobile has been located in the State of Texas during the past thirty days.

Interrogatory No. 4

Identify all states in which you have held a driver's license within the past one year and the dates you held such license(s).

ANSWER:

Respondent has held drivers' licenses in the State of Texas and Wyoming. Respondent obtained his Wyoming driver's license on or about July, 21, 2000 at which time his Texas license was invalidated and perforated with the word "VOID." Respondent's Wyoming license is the only valid license he currently possesses.

Interrogatory No. 5

[As modified by the court:] State the billing address for each credit card issued personally to you for the time period January 1, 2000 through November 27, 2000.

ANSWER:

Credit card statements are delivered to Respondent's former assistant at Halliburton. Since July 2000, the statements have been forwarded to Respondent in Virginia, Wyoming and

on the campaign trail. As noted, the assistant is currently relocating to Washington, D.C. and the billing address for credit card statements will be changed accordingly.

Interrogatory No. 6

[As modified by the court:] State the mailing address for each magazine to which you personally subscribed during the time period January 1, 2000 through November 27, 2000.

ANSWER:

Magazines have been delivered to Respondent's house in Dallas, former office at Halliburton and to his townhouse in McLean, Virginia.

Interrogatory No. 8

State the address listed on your personal income tax return for the tax year 1999.

ANSWER:

500 North Akard Street
#3600
Dallas, Texas 75201

Interrogatory No. 9

State your address listed on your quarterly estimated tax payment (Form 1040-ES) due September 15, 2000.

ANSWER:

None. No such form was filed.

Interrogatory No. 10

State all reasons you terminated your employment with Halliburton.

ANSWER:

Respondent retired from the Halliburton Corporation to accept the nomination of the Republican Party to run for the office of Vice President of the United States.

Interrogatory No. 11

Identify the date you "re-registered to vote in Wyoming."

ANSWER:

Respondent re-registered to vote in the State of Wyoming on or about July 21, 2000.

Interrogatory No. 14

[As modified by the court:] Identify all real property in which you own an interest including, without limitation, description, address, city, county, state.

ANSWER:

Respondent holds interests in a home in Jackson Hole, Wyoming; a house in Highland Park, Texas; a townhouse in McLean, Virginia; and an undeveloped lot in McLean, Virginia.

REQUESTS FOR ADMISSIONS

Request for Admission No. 1

As of November 27, 2000, you had not, nor had anyone on your behalf, notified the Chief Appraiser of the Dallas Central Appraisal District in writing that your right to a homestead exemption on your home located at 3812 Euclid Avenue, Highland Park, Texas, had ended.

RESPONSE:

Admitted. Notice of a change in entitlement to the homestead exemption is not required to be filed until May 2001.

Request for Admission No. 2

[As modified by the court:] During the time period January 1, 2000 and November 27, 2000, you did not file a change-of-address form with the United States Post Office.

RESPONSE:

Admitted in part and denied in part. In July 2000, the U.S. Postal Service was notified to rescind a previous order on file in Teton County, Wyoming to forward Respondent's mail to Dallas, Texas. Additionally, since July 2000, mail directed to respondent in Texas was delivered to or otherwise collected by a former assistant who has routinely forwarded it to Respondent in Virginia, Wyoming or on the campaign trail. The assistant is in the process of relocating to Washington, D.C. and further instructions will be filed shortly with the U.S. Postal Service.

Request for Admission No. 3

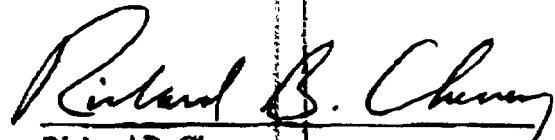
You have publicly referred to your house in Jackson Hole, Wyoming as a "vacation home" or words to that effect.

RESPONSE:

Respondent has no current recollection of referring to his residence in Jackson Hole as his vacation home.

28 U.S.C. § 1746 Declaration

I declare under penalty of perjury that the foregoing statements of fact that are contained in the responses to interrogatories are true and correct. Executed on this 29th day of November 2000.


Richard B. Cheney



Barry P. McNeil
Texas State Bar No. 13829500
Robin P. Hartmann
Texas State Bar No. 09168000
Stacy L. Brainin
Texas State Bar No. 02863075
HAYNES & BOONE LLP
3100 NationsBank Plaza
Dallas, Texas 75202
Telephone: (214) 651-5000
Facsimile: (214) 651-5940

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was served upon the Plaintiffs' counsel and all other counsel of record via telecopier on this the 29th day of November, 2000 at 9:00 a.m.



Stacy L. Brainin




**Dallas Central
Appraisal District**

CERTIFICATE OF AUTHENTICITY OF OFFICIAL RECORDS

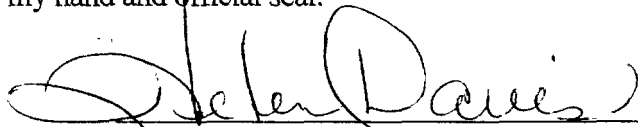
BEFORE ME, the undersigned official on this day appeared, W. KENNETH NOLAN, who is personally known to me, and first being duly sworn according to law upon his oath deposed and said:

My name is W. KENNETH NOLAN, I am over 18 years of age. I have never been convicted of a crime, and I am fully competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are all true and correct.

I am custodian of the records of the DALLAS CENTRAL APPRAISAL DISTRICT. Attached hereto are 3 pages of duplicate copies of official records from the District's Appraisal Records. These said pages of records are kept by the Appraisal District in the regular course of business, and it was the regular course of business of the Appraisal District for a representative of the District with knowledge of the act, event, condition, opinion, or diagnosis, recorded to make the record; and the record was made at or near the time of receipt of same or reasonably soon thereafter. The records attached hereto are exact duplicates of the originals.


W. KENNETH NOLAN
CUSTODIAN OF THE RECORDS

SUBSCRIBED AND SWORN TO BEFORE ME ON THE 15 day of Nov
2000, to certify which witness my hand and official seal.


NOTARY PUBLIC in and for the State of Texas
HELEN DAVIS
Notary Public, State of Texas
Name Typed or Printed
03/21/2001

ACCOUNT NUMBER
60084500240110000PROPERTY ADDRESS
3812 EUCLID
MAPSCO 35-Q

AVE TH

OWNER	CHENEY RICHARD B &	LEGAL	HIGHLAND PARK
ADDRESS	LYNNE V CHENEY		BLK 24 LT 11
	3812 EUCLID AVE		
CITY/ST	HIGHLAND PARK	TX	VOL95216/1326 DD110195 CO-DALLAS
ZIP CODE	752053102		0845002401100 1TH08450024
		PRICE	MARKET ADJUSTED
ZONING	DIMENSIONS	FLAG	PRICE
LAND C	75X226		ADJUST UNIT PRICE TOTAL VALUE
			15,000.00 1,125,000.00

*** 2000 CERTIFIED VALUES ***

TOTAL IMP VALUE	538,270
TOTAL LAND VALUE	1,125,000
MARKET VALUE	1,663,270

AGENT/FIRM

PRESS (PF1) SEARCH MENU (PF2) RESIDENTIAL MENU (PF3) NEXT SCREEN

ACCOUNT # 60084500240110000

LOCATION ADDR:		3812	EUCLID				AVE	
EXEMPTIONS APPLIED FOR 2000 CERTIFIED VALUES								
ENTY	GENERAL HMSTD	%	OPTIONAL HMSTD	OVR 65 HMSTD	DISABLED HMSTD	DISABLED VETERAN	HISTORIC EXMPTN	TAXABLE VALUE
CNTY:		20	332654					1,330,616
CITY:		20	332654					1,330,616
SCHL: 15000		20	332654					1,315,616
HOSP:		20	332654					1,330,616
COLL:		20	332654					1,330,616
SPD1:								
TOTALLY EXEMPT			OVER 55 SURVIVING SPOUSE					
CAPPED HOMESTEAD AMT:								
PR FLG	DY TX	NAME			EF DTE		RMV DT	
PR FLG	DY TX	NAME			EF DTE		RMV DT	
PR FLG	DY TX	NAME			EF DTE		RMV DT	

PRESS (F1) SEARCH MENU (F2) RESI MENU (F3) NEXT SCREEN (F4) PREV SCREEN

MAPAMR1

DALLAS CENTRAL APPRAISAL DISTRICT

E MARY OF APPRAISAL HISTORY

VCSTAMR1

11/15/2000

ACCOUNT NUMBER 60084500240110000

TRM:DA14

MKT VALUES

2000

1999

1998

1997

1996

IMP

538270

575120

662780

662780

328960

LAND

1125000

960000

787500

660000

660000

MARKET

1663270

1535120

1450280

1322780

988960

SPEC ASMT (AG)

CAPPED HS

TAXABLES

CNTY

DC

1330616

1228096

1160224

1058224

791168

CITY

TH

1330616

1228096

1160224

1058224

791168

SCHL

HS

1315616

1213096

1145224

1043224

786168

HOSP

PH

1330616

1228096

1160224

1058224

791168

COLL

DO

1330616

1228096

1160224

1058224

791168

SPDS

EXEMPTIONS:

HOMESTEAD

X

X

X

X

X

SR CITIZEN

DISABLED

VETERANS

HISTORIC

TOTAL EXMP

PRESS (PF1) MAIN MENU (PF2) RESI MENU (PF4) ANOTHER ACCOUNT (PF8) HISTORY MENU

11-28-2000
11:50:56

DALLAS COUNTY Elections Administrator
VOTING HISTORY REPORT

PAGE 1

RICHARD BRUCE CHENEY

Registered Address : 3812 EUCLID
DALLAS TX 75205

Voter-ID: 02478867 Registered: 12-04-1995 Status: Canceled - Registered Elsewh

B4 POLL X 1227
11/03/1998 GOVERNOR/CITY COP
89 POLL X 1196
11/05/1996 PRESIDENTIAL

State of TEXAS
County of DALLAS

I, Bruce Sherbet, Elections Administrator, hereby certify
the foregoing to be a true and correct copy of the voting record
of RICHARD BRUCE CHENEY as it appears on record in my office.

Witness my hand and seal on November 28, 2000.

Bruce Sherbet
Elections Administrator

By: _____


Deputy

VOTER REGISTRATION APPLICATION (SOLICITUD DE INSCRIPCION DE VOTANTE)		For Official Use Only	
Last Name (Apellido) CHENEY		First Name (NOMBRE) (Su nombre, la pila) RICHARD	Middle Name (If any) (Su segundo Nombre) (si hay) BRUCE
Residence Address: Street Address and Apartment Number, City, State, and ZIP. If none, describe where you live. (Do not include P.O. Box or Rural Rt.) (Dirección: Calle y número, número de apartamento, ciudad, estado y Código Postal. A falta de estos datos, describa la localidad de su residencia. No incluya una casilla postal ni su ruta rural.) 3812 EUCLID, DALLAS, TX 752050000			
Mailing Address: City, State and ZIP. If mail cannot be delivered to your residence address, (Do not use postal code) (City only) (Código Postal. No es posible entregar la correspondencia a domicilio.) 800 N AKARD SUITE 3800, DALLAS, TX 752010000		Gender (Optional) (Sexo) (Opcional) <input checked="" type="checkbox"/> Male (Hombre) <input type="checkbox"/> Female (Mujer)	
Date of Birth: month, day, year (Fecha de nacimiento) (mes, día, año) 01-30-1941	City and County of Former Residence (Ciudad y condado de su residencia anterior) OT	Social Security No. (Optional) (Número de Seguro Social) (Opcional)	
I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law, (Entiendo que el hecho de proporcionar datos falsos a fin de obtener inscripción en el registro de votantes constituye el delito de perjurio o declaración falsa, es una infracción sancionable por ley federal y estatal.)		TX Driver's License No. or Personal I.D. No. (Issued by TX Dept. of Public Safety) (Optional) (Número de su licen. o tarjeta de manejo o de su Cédula de Identidad) (emitida por el Departamento de Seguridad Pública de Texas) (Opcional)	
I affirm that I (Declaro que soy): <ul style="list-style-type: none">am a United States citizen; (ciudadano/a de los Estados Unidos)am a resident of this county; (residente del condado)have not been finally convicted of a felony or if a felon I am eligible for registration under section 13.001, Election Code; and (que no he sido condenado/a en definitiva por un delito penal, o en caso de tal condena, que estoy habilitado/a para inscribirse a tener de la dispuesto por la sección 13.001 del Código Electoral)have not been declared mentally incompetent by final judgment of a court of law. (que no me ha declarado mentalmente inapacitado por orden judicial)		Telephone Number (Optional) (Número telefónico) (Opcional)	
		Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant If Signed by Witness and Date. (Firma o nombre de su representante o de su apoderado/a. Si el representante o apoderado/a no es el solicitante, escriba el nombre de su representante, la fecha en forma de mes día y año.) X Richard B. Cheney DEC 04 1995	

DI-02478867 T
REQUEST FOR VOTER REGISTRATION WITHDRAWAL
(W.S. 22-3-106)

JUL 25 2000

I, RICHARD B. CHENEY, having now registered to vote in the county
of TETON, State of Wyoming, hereby request that my registration to vote
in the county of DALLAS State of TEXAS be withdrawn
My previous address was 3812 ENCLID AVE Street or RFD
DALLAS, TEX. 75205 City and Zip Code

+ JAN. 30, 1941 +
Birth Date

+ Richard B. Cheney
Signature of Requester
(Name as it appears on registry list)

Subscribed and sworn to before me this 21st day of July, 2000



Sharon K. Dethlefsen
Name of person receiving request

Dep. Clerk
Title

Prepared by Secretary of State

Voter ID: 02478867

Name : CHENEY, RICHARD BRUCE
Status : 1Address: 3812 EUCLID
City : HPDA DALLAS Zip : 75205

Precinct : 1227-0

Mailing Address:

500 N AKARD
SUITE 3600
DALLAS TX 75201

Gender: U

Date Of Birth : 01-30-1941

Register Date : 12-04-1995

Issue Date : 01/01/2000

SS# : - -

Driver Lic :

Change Date : - -

Military : NO

Overseas : NO

Felon : NO

Homeless : NO

Withheld : NO

Federal : NO

Disabled : NO

Jury Exempt : NO

Last Activity:

Last Card Req:

Last Voted: 11/03/1998

Last Change: 08/02/2000

Election Worker: NO

Voter's Districts:

CYHP00	CITY COUNCIL DIST HP00
CL-02	COLLEGE DISTRICT 02
COMM01	COMMISSIONER DIST 1
CD-26	CONGRESSIONAL DISTRICT 26
ED-00	ELECTION WIDE
JP-1	JUSTICE OF THE PEACE 1
LD-108	LEGISLATIVE DISTRICT 108
SHHP00	SCHOOL DISTRICT HP00
SB-12	STATE SCHOOL BOARD 12
SS-08	STATE SENATE 08
WDPC	WATER DISTRICT C HP/UP

DATE	OPERATOR	CHANGE	NOTES
08/02/2000 09:49:09	ECOX	[changedate] from '' to '08/02/2000' [changeccode] from '' to '16' [mail_addr3] from 'DALLAS, TX' to 'DALLAS TX' [dtlastchg] from '12/08/1997' to '08/02/2000' [status] from 'A' to '1'	TETON, WYOMING
07/25/2000 16:20:46	VOTER	[lastvote] from '/' to '11/03/1998'	Voting History Change
12/03/1999 07:04:40	changedbySQ	[issue_date] from '01-JAN-98' to '01/01/2000'	Voter Card Requested - mass mailing for voters with regdate <= 12-02-1999
12/08/1997 00:00:00	ESSADMIN	[unknown] from 'unknown' to 'See notes'	Precinct number changed by re districting or by correction
12/13/1995 00:00:00	ESSADMIN	[unknown] from 'unknown' to 'See notes'	New Voter

** End of Report ***

11-28-2000
11:50:44

DALLAS COUNTY Elections Administrator
VOTING HISTORY REPORT

PAGE 1

LYNNE ANN CHENEY

Registered Address : 3812 EUCLID
DALLAS TX 75205

Voter-ID: 02536383 Registered: 05-15-1996 Status: Canceled - Registered Elsewh


B4 POLL X 1227
11/03/1998 GOVERNOR/CITY COP

State of TEXAS
County of DALLAS

I, Bruce Sherbet, Elections Administrator, hereby certify
the foregoing to be a true and correct copy of the voting record
of LYNNE ANN CHENEY as it appears on record in my office.
Witness my hand and seal on November 28, 2000.

Bruce Sherbet
Elections Administrator

By: _____


Deputy

VOTER REGISTRATION APPLICATION (SOLICITUD DE INSCRIPCION DE VOTANTE)		For Official Use Only (Solo para uso oficial)	
Last Name (Apellido) CHENEY		First Name (NOMBRE) LYNNE	Middle Name (Nombre) ANN
Residence Address: Street Address and Apartment Number, City, State, and ZIP. If none, describe where you live. (Do not include P.O. Box or Rural Route.) 3812 EUCLID ST DALLAS, TX 752050000		Former Name 2536383	
Mailing Address, City, State and ZIP. If mail cannot be delivered to your residence address, (Do not complete if mail is sent to you by mail.) 3812 EUCLID ST DALLAS, TX 752050000		Gender (Optional) <input type="checkbox"/> Male (Hombre) <input type="checkbox"/> Female (Mujer)	
Date of Birth: month, day, year 08-14-1941	City and County of Former Residence (Ciudad y condado de residencia anterior)	Social Security No. (Optional) (Número de Seguro Social (opcional))	
I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law. (Entiendo que el hecho de proporcionar información falsa a fin de obtener inscripción en el registro de votantes constituye el delito de perjurio declaracion falsa es una infraccion sancionable por ley federal y estatal.)		TX Driver's License No. or Personal I.D. No. (Issued by TX Dept. of Public Safety) (Optional) (Número de su licencia de manejo o número de su Cédula de Identidad expedida por el Departamento de Seguridad Pública de Texas) (opcional)	
I affirm that I am, (Yo afirmo que soy...) <ul style="list-style-type: none">• am a United States citizen; (soy ciudadano de los Estados Unidos)• am a resident of this county; (residencia en condado)• have not been finally convicted of a felony or if a felon I am eligible for registration under section 13.001, Election Code; and (que no he sido condenado en definitiva por un delito penal, o si lo he sido, tengo la libertad para inscribir a favor de lo dispuesto por la sección 13.001 del Código Electoral)• have not been declared mentally incompetent by final judgment of a court of law.		Telephone Number (Optional) (Número de teléfono) (opcional)	
I certify that the information furnished is true and correct to the best of my knowledge. (Yo certifico que la información suministrada es verdadera y correcta a lo mejor de mi conocimiento.)		Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date. (Firma del solicitante o del agente designado o el nombre del solicitante si es firmado por un agente designado, la fecha y la relación.)	

Voter ID: 02536383

Name : CHENEY, LYNNE ANN
Status : 1Address: 3812 EUCLID
City : HPDA DALLAS Zip : 75205

Precinct : 1227-0

Gender: U

Date Of Birth : 08-14-1941

Register Date : 05-15-1996

Issue Date : 01/01/2000

SS# : - -

Driver Lic :

Change Date : - -

Military : NO

Overseas : NO

Felon : NO

Homeless : NO

Withheld : NO

Federal : NO

Disabled : NO

Jury Exempt : NO

Last Activity:

Last Card Req:

Last Voted: 11/03/1998

Last Change: 09/05/2000

Election Worker: NO

Voter's Districts:

CYHP00	CITY COUNCIL DIST HP00
CL-02	COLLEGE DISTRICT 02
COMM01	COMMISSIONER DIST 1
CD-26	CONGESSIONAL DISTRICT 26
ED-00	ELECTION WIDE
JP-1	JUSTICE OF THE PEACE 1
LD-108	LEGISLATIVE DISTRICT 108
SHHP00	SCHOOL DISTRICT HP00
SB-12	STATE SCHOOL BOARD 12
SS-08	STATE SENATE 08
WDPC	WATER DISTRICT C HP/UP

DATE	OPERATOR	CHANGE	NOTES
09/05/2000 10:38:22	JWEST	[changedate] from '' to '09/05/2000' [changeccode] from '' to '16' [dtlastchg] from '12/08/1997' to '09/05/2000' [status] from 'A' to '1'	TETON
08/14/2000 11:53:32	TPHILLIPS	[lastvote] from '/' to '11/03/1998'	Voting History Change
12/03/1999 07:04:40	changedbysp	[issue_date] from '01-JAN-98' to '01/01/2000'	Voter Card Requested - mass mailing for voters with regdate <= 12-02-1999
12/08/1997 00:00:00	ESSADMIN	[unknown] from 'unknown' to 'See notes'	Precinct number changed by re districting or by correction
05/28/1996 00:00:00	ESSADMIN	[unknown] from 'unknown' to 'See notes'	New Voter

*** End of Report ***

AFFIDAVIT OF ANN HUBENER, GRI

STATE OF TEXAS

COUNTY OF DALLAS


Before me, the undersigned authority, personally appeared Ann Hubener, who after being duly Sworn, stated as follows:

1. My name is Ann Hubener. I reside in Duncanville, Dallas County, Texas. I am a United States citizen, over 21 years of age
2. I possess knowledge of the matters set forth below and they are true and correct to the best of my knowledge utilizing the North Texas Real Estate Information Systems, Inc.
3. I am a Texas real estate broker licensee and have been since 1971. My license number is 0162413. I am a Graduate of the Real Estate Institute (GRI). I am also a Master Business Broker. I am a member of the Greater Dallas Association of Realtors. I am not an appraiser.
4. I am an associate at Henry S. Miller, Realtors. My business address is 407 North Cedar Ridge, Suite 100, Duncanville, TX 75116.
5. Henry S. Miller, Realtors is the exclusive listing agent for the residence owned by Richard B. Cheney and wife located at 3812 Euclid Avenue in Highland Park, Dallas, Texas. I have not personally inspected this property.
6. Mr. And Mrs. Cheney listed this residence with Henry S. Miller, Realtors on November 16, 2000.
7. The property is being presented as "owner occupied".
8. The property is not under contract of sale at this time.
9. According to the North Texas Real Estate Information Systems, Inc. (NTREIS), the official listing systems for all properties in North Texas, the listing price for this home is \$3,100,000.00. A true and correct copy of this is attached hereto as Exhibit "A" and is incorporated herein by reference for all purposes. The home has three bedrooms, four ½ bathrooms, is one story, has 4,679 square feet and was built in 1971. It has no pool.
10. The average selling time for a property in the immediate neighborhood has been 130 days. This is using sales for the last twelve (12) months.

11. The range of sales prices per square foot for this same period and in the same area has been from \$357.32 per square foot to \$522.61 per square foot.
12. This residence is being offered at \$662.53 per square foot. Based on the above criteria my opinion is the property may be overpriced and will not sell quickly.
13. According to the Dallas Central Appraisal District information, which is attached hereto as Exhibit "B" (4 pages) and is incorporated by reference for all purposes. It evidences Mr. Cheney received the Texas general homestead exemption in 2000.

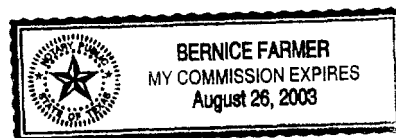

Ann Hubener, GRI

SUBSCRIBED AND SWORN TO BEFOARE ME on this 27 day of November, 2000.


Notary Public in and for the State of Texas

BERNICE FARMER
Notary's printed name

My commission expires: 8-26-03



MLS#:9253327p St:ACT Cat:RES LP: \$3,100,000
 Orig LP: \$3,100,000 Low:
 Addr:3812 EUCALID AVE * U#:
 City:DALLAS * Zip:75205-3102*
 Cnty:DALLAS Map:0035/Q*/DA
 Subdv:HIGHLAND PARK
 Area:025/15 Lot: Block:
 Legal: MUD Dst:N
 Parcel ID:60084500240110000 * Mit:Y

Bedrooms: 3 HOA:N Dues: /
 Full Baths Lvl:4 1st: 2nd: 3rd: Bsmt:
 Half Baths Lvl:1 1st: 2nd: 3rd: Bsmt:
 SqFt: 4,679*/TAX Lst\$/Sqft: \$662.53

Room Dimensions/Levels: Type:SINGLE FAMIL
 Living 1:27X23 1 F.Dining: 27X19 1 Mstr BR: 18X22 1 # Fireplaces: 2
 Living 2: X Breakfast: X Bedroom2:13X17 1 #Living Area: 2
 Living 3: X Kitchen: 21X20 1 Bedroom3:13X17 1 #Dining Area: 2
 Study: 28X17 1 Other Rm: X Bedroom4: X Handicap Amenit:N
 Utility: 6X 9 1 Other Rm: X Bedroom5: X Yr Blt:19/1* EXIST

School District:HIGHLANDPA* Covered Parking:3 #Stories: 1
 School Type:E Name:ARMSTRONG Bus: Garage Spaces: Security Sys: Y
 School Type:M Name:HIGHLANDPA Bus: Garage Size: X Pool: N
 School Type:H Name:HIGHLANDPA Bus: Carport Spaces: 3 Acres: .00
 School Type: Name: Bus: Lot Dimensions:75 X 226

HOU-SINGLE STY-CONTEMP LTS-<.5 ACRE LTD-CORNER LTD-HVYTREED LTD-NO BKVD
 EXF-COV PRCH EXF-PAT COV EXF-GUTTERS EXF-SPRK SYS EXF-LTNG SYS EXF-GRN HSE
 CON-BRICK FND-PIERBEAM ROF-OTHER FEN-BRICK FEN-TRON PAR-ATTACHED
 PAR-REAR PAR-OUT ENTR PAR-CIRCLE PAR-COVERED STU-CITY WAT STU-CITY SEW
 INF-SHUTTERS INF-CABLE AV INF-DEC LTNG BBF-SPLIT BD BBF-W/I CLOS BBF-BUILTINS
 BBF-SEP VAN BBF-SEP SHOW BBF-LTN CLOS SPR-LIBR/STU FRP-WOODBURN KEQ-CKTP-GAS
 KEQ-OVEN-ELE KEQ-DBL OVEN KEQ-INDOORGR KEQ-SELF CLN KEQ-MICRO KEQ-WARMIRAW
 KEQ-B-1 REF KEQ-DISHWSHR KEQ-DISPOSAL KEQ-COMPACT KEQ-ICEMAKER KEQ-PLUMB GAS
 KOT-ISLAND KOT-BRK BAR KOT-GRANITE KOT-OTHER UTR-SEP ROOM UTR-DRY-HK-F
 UTR-SINK UTR-FRZ-ROOM UTR-2ND PNTR SCT-FIRE/SMK SCT-BURGLAR SCT-OWNED
 SCT-MONITOR FLR-TERRAZZO FLR-WOOD HAC-AIR-ELE HAC-HEAT-GAS ASI-NO ASSUM
 POS-CLOS/FND SHO-AGT/OWN

REMARKS

ARCHITECTURAL MASTERPIECE TOTALLY ENCLOSED INCLDG COURTYD & GATED PARKWAY
 LCTD ON ONE OF OLD HP'S MOST DESIRABLE SITES.2FT THICK EXPOSED BRICK WALLS,
 12FT CLNGS,HDWD & TRAVERTINE FLRS (CUSTOM CRAFTSMANSHIP & ENHANCED SECURITY
 IN UNIQUE IMPECCABLE SETTING.WINDOWS & MOVABLE SHUTRS FROM CLNG TO FLR.
 Directions:ONE BLOCK FROM TOWNHALL BETWEEN DREXEL AND LAKESIDE ON
 CORNER OF FAIRFIELD

Loan Type: TCLR Bal: Equity: Int Rate:
 Payment: Pmt Type: Lender:
 Orig Date: 2nd Mortg:N Unexempt Taxes: * For Lease: N

SAC:2.5 BAC:2.5 Var:N List Type: EA DOM: 9 LD:11/16/2000 XD:
 LO:ALFE01 ALLIE BETH ALLMAN R. E. (214) 522-7355 Fax:(214) 521-3847
 LO Addr:SUITE 102, 5015 TRACY, DALLAS, TX 75205-
 LA:0229822 ALLIE BETH ALLMAN (972) 380-7750 Fax:
 Agt Oth: LA Email:aballman@henrysmiller.com
 Call:AGT Appt:(214) 219-7473 X: Brk Lic #: 0395962 Tour:11/21/2000

Dallas Central Appraisal District

Residential Property

Account Number: 60084500240110000

PROPERTY LOCATION DATA

Street Address: 3812 EUCLID AVE

Mapsc0: 35-Q

Neighborhood Code: V08



VALUATION DATA

Tax Year: 2000 Certified	Tax Agent: n/a -
Total Improvement Value:	\$538,270.00
Total Land Value:	\$1,125,000.00
2000 Certified Total Market Value	\$1,663,270.00
Special Assessment:	\$0.00
Capped Homestead Value:	\$0.00

OWNERSHIP DATA

Owner Name: CHENEY RICHARD B &
Address: LYNNE V CHENEY
Street: 3812 EUCLID AVE
City: HIGHLAND PARK State: TX Zip: 752053102

LEGAL DESCRIPTION

Legal Line 1: HIGHLAND PARK
Legal Line 2: BLK 24 LT 11

EXHIBIT "B"

Legal Line 3:

Legal Line 4: VOL95216/1326 DD110195 CO-DALLAS

Legal Line 5: 0845002401100 16908450024

Deed Transfer Date: 19951103

IMPROVEMENT DATA

Building Class:	24	Foundation Type:	SL	Bath Full:	4
CDU:	V	Exterior Wall 1:	BV	Bath Half:	1
Number of Stories:	A	Exterior Wall 2:		Basement:	NO
Living Area:	4679	Roof Type:	FL	Kitchen:	1
Year Built:	1971	Roofing Material:	TG	Pool:	0
Age:	29	Air Conditioning:	CF	Sauna:	0
Construction:		Heating:	CF	Wet Bar:	0
Frame Type:	FR	Fireplace:	2		

Additional Improvements

Servants Quarters

Area: 0

Dep: 0

Garage / Carport

Garage/Carport 1

Garage/Carport 2

G/C:	2	0
Area:	805	0
Depreciation:	0	0
Location:	AT	
Construction:	BK	
Floor:	CF	

Accessory Buildings

	Building Description	Area
Building 1:		0
Building 2:		0
Building 3:		0

LAND DATA

SPTB Code: A11

Zoning:	Dimensions:	Price Flag:	Unit Price:	Market Adjustment:	Adjusted Price:
C	0	R	\$15,000.00	0	\$15,000.00
	0		\$0.00	000	\$0.00

Non-Agricultural Land Value:

Agricultural Land Value:

VALUATION METHODS

Cost Approach:

Living Area: 4679

Depreciation:

Depreciated Value of Living Area: 30

TAXING JURISDICTIONS

Entity Type	Entity Name	2000 Tax Rate
City:	City Of Highland Park	(.002462000)
County:	Dallas County	(.002016670)
College:	Dallas Co. Community College	(.000500000)
Hospital:	Parkland Hospital	(.002540000)
School:	Highland Park Isd	(.015830000)
Special District:		()

EXEMPTION DATA

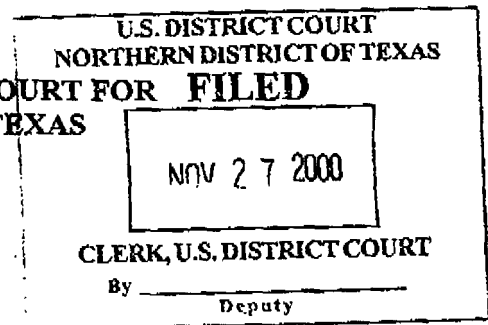
Taxing Jurisdiction	General Homestead	Over 65	Disabled Person	Disabled Vet	Taxable Value
City	\$332,654.00	\$0.00	\$0.00	\$0.00	\$1,330,616.00
County	\$332,654.00	\$0.00	\$0.00	\$0.00	\$1,330,616.00
College	\$332,654.00	\$0.00	\$0.00	\$0.00	\$1,330,616.00
Hospital	\$332,654.00	\$0.00	\$0.00	\$0.00	\$1,330,616.00
School	\$347,654.00	\$0.00	\$0.00	\$0.00	\$1,315,616.00
Special District 1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Totally					

Exempt:
Over 55
Surviving
Spouse:

PROPERTY HISTORY

Market Values	1999	1998	1997	1996	1995
Improvement	\$575,120.00	\$662,780.00	\$662,780.00	\$328,960.00	\$305,960.00
Land	\$960,000.00	\$787,500.00	\$660,000.00	\$660,000.00	\$660,000.00
Market	\$1,535,120.00	\$1,450,280.00	\$1,322,780.00	\$988,960.00	\$965,960.00
Cap-Hmstd	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Spec. Asmt.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Taxable Values	1999	1998	1997	1996	1995
County Taxable	\$1,228,096.00	\$1,160,224.00	\$1,058,224.00	\$791,168.00	\$703,768.00
City Taxable	\$1,228,096.00	\$1,160,224.00	\$1,058,224.00	\$791,168.00	\$722,768.00
School Taxable	\$1,213,096.00	\$1,145,224.00	\$1,043,224.00	\$786,168.00	\$757,768.00
Spec Dist - Taxable	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Hosp - Taxable	\$1,228,096.00	\$1,160,224.00	\$1,058,224.00	\$791,168.00	\$703,768.00
College - Taxable	\$1,228,096.00	\$1,160,224.00	\$1,058,224.00	\$791,168.00	\$722,768.00

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



STEPHEN B. JONES, LINDA D.
LYDIA and CAROLINE FRANCO,
as Texas registered voters,

Plaintiffs,

v.

GOVERNOR GEORGE W. BUSH
AND RICHARD B. CHENEY, as
candidates for President and Vice-
President of the United States of America; and
ERNEST ANGELO, GAYLE WEST,
BETTY R. HINES, JAMES B. RANDALL,
HELEN QUIRAM, HENRY W. TEICH, JR.,
WILLIAM EARL JUETT, HALLY B.
CLEMENTS, HOWARD PEBLEY, JR.,
ADAIR MARGO, TOM F. WARD, JR.,
CARMEN P. CASTILLO, CHUCK JONES,
MICHAEL PADDIE, JAMES DAVIDSON
WALKER, JOSEPH I. O'NEIL, III,
BETSY LAKE, ROBERT J. PEDEN,
JIM HAMLIN, MARY E. COWART,
SUE DANIEL, JAMES R. BATSELL,
LOYCE MCCARTER, MICHAEL DUGAS,
NEAL J. KATZ, MARY CEVERHA,
CLYDE MOODY SIEBMAN, RANDALL TYE
THOMAS, CRUZ G. HERNANDEZ,
JOHN ABNEY CULBERSON, STAN STANART,
AND KEN CLARK, Texas Electors,

Defendants.

CIVIL ACTION NUMBER
3:00-CV2543-D

**RESPONSE OF DEFENDANTS GOVERNOR GEORGE W. BUSH AND
RICHARD B. CHENEY TO THE COURT'S ORDER OF NOVEMBER 22, 2000**

Governor George W. Bush ("Governor Bush") and Richard B. Cheney ("Secretary
Cheney") respond as follows to this Court's Order dated November 22, 2000:

I.**INTRODUCTION**

In its Order dated November 22, 2000, the Court orders the defendants to respond to Plaintiffs' request for (1) expedited discovery, including a deposition of Secretary Cheney on or before December 1, 2000, and (2) an expedited preliminary injunction hearing no later than December 12, 2000, combined with the trial on the merits of this case pursuant to Rule 65(a)(2), Fed. R. Civ. P. As discussed in more detail below, Governor Bush and Secretary Cheney respond that:

1. They have filed a Motion to Dismiss that, they believe, will dispose of this entire action on the face of the pleadings. No discovery should be allowed pending the resolution of their Motion;
2. If discovery is allowed (which it should not be), then it should be limited to written discovery only. It should not include the oral deposition of Secretary Cheney because any evidence the Plaintiffs arguably require is available through less intrusive means; and
3. If this Court proceeds with a preliminary injunction hearing (which it should not for the reasons stated in the Motion to Dismiss), then the hearing should not be combined with a trial on the merits. Instead, any preliminary injunction application should be decided based on the papers and written evidence as set forth in the Court's first November 22, 2000 order.

II.**DISCUSSION****A. Accelerated discovery should not be allowed.**

Governor Bush and Secretary Cheney have filed a joint Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) on the grounds that: (i) Plaintiffs lack standing to assert the claims that are the subject of this suit; (ii) the Court lacks subject matter jurisdiction under the political question doctrine; and (iii) Plaintiffs have failed to state a claim for which relief can be granted. These are pure issues of law for which no discovery is required, and Governor Bush

and Secretary Cheney believe that the Court's resolution of these issues will dispose of the entire case. Accordingly, Governor Bush and Secretary Cheney urge the Court not to allow any discovery pending a resolution of their Motion to Dismiss. *See, e.g., Petrus v. Bowen*, 833 F.2d 583 (5th Cir. 1987) ("A trial court has broad discretion and inherent power to stay discovery until preliminary questions that may dispose of the case are determined.").

B. Secretary Cheney should not be required to give an oral deposition.

If the Court allows discovery, then it should only allow limited written discovery specifically tailored to facts that are directly relevant to this case, and it should not allow an oral deposition of Secretary Cheney. As courts have repeatedly recognized, there is an extraordinary potential for abuse in depositions of high-ranking public officials and prominent private citizens. *See, e.g., In re F.D.I.C.*, 58 F.3d 1055, 1060 (5th Cir. 1995) (discussing high ranking public officials); *Baine v. General Motors Corp.*, 141 F.R.D. 332, 334 (M.D. Ala. 1991) (discussing corporate executives).

Although the Plaintiffs have alleged that Secretary Cheney is an "inhabitant" of Texas, not Wyoming, they have not identified any discovery they need from any of the defendants with respect to this claim, nor have they stated why they legitimately need to depose Secretary Cheney with respect to this claim. On the contrary, almost all the evidence relevant to the determination whether Secretary Cheney is an inhabitant of Texas or Wyoming is objectively verifiable, public information. For example, it is publicly available information that Secretary Cheney:

1. Grew up in Wyoming and was elected to Congress from Wyoming for six terms;
2. Has had a house in Wyoming for more than 20 years;

3. Moved to Dallas in 1995 to accept a position as CEO of Halliburton, but resigned from that position several months ago;
4. Has publicly announced that he and his wife are making their house in Jackson Hole, Wyoming their new permanent home;
5. Has put his house in Dallas up for sale;
6. Has re-registered to vote in Wyoming and voted in Wyoming during the most recent elections;
7. Has obtained a Wyoming drivers license; and
8. Has canceled his Texas voters registration and drivers license.

There is simply no legitimate need to impose upon Secretary Cheney for an oral deposition to verify these and similar facts. Further, there can be no legitimate issue about Secretary Cheney's intent in changing his inhabitation. At a minimum, to the extent the Court believes that there is any legitimate testimony that Plaintiffs need from Secretary Cheney, it is discoverable by less intrusive means, *e.g.* interrogatories.

C. The preliminary injunction hearing, if any, should be based on the papers and it should not be consolidated with a trial on the merits.

If this Court were to proceed to hear the request for preliminary injunctive relief, which the defendants believe the Court should not do, then such request can be heard on the basis of affidavits and other papers as stated by this Court in its first November 22, 2000 order. Plaintiffs can make no showing of need for oral testimony. There is absolutely no basis for Plaintiffs to claim that there is an issue of credibility in this matter and Plaintiffs have not suggested there is. Further, the facts are uncontested and uncontestable.

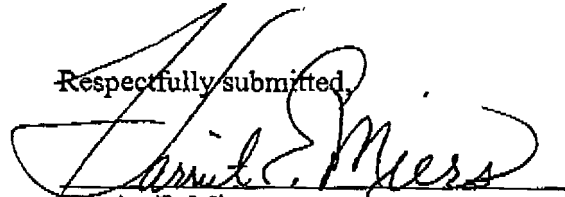
With respect to the issue of consolidation, Governor Bush and Secretary Cheney agree that, generally speaking, consolidation of a hearing on the request for preliminary injunction with the trial on the merits is often appropriate. However, in this matter, Plaintiffs have created an

urgency for themselves that should not unduly burden the defendants. The defendants in this matter, if it is to proceed, are entitled to a reasonable amount of time to prepare for a final trial on the merits. Plaintiffs have delayed many months in bringing this action and seeking relief. Conducting a trial on the merits in the short amount of time available is unreasonable to the defendants. In fact, at the present time, the vast number of the defendants most recently named have not been served, and hailing them before the Court will be time consuming. These circumstances are all of Plaintiffs own making. Plaintiffs, at most, should be entitled to pursue their request for a preliminary injunction in accordance with the procedure specified in the Court's first November 22, 2000 order. A trial on the merits should be set in due course after determination of the request for preliminary injunction, if this matter is to proceed at all.

WHEREFORE, PREMISES CONSIDERED, Governor Bush and Secretary Cheney respectfully request that the Plaintiffs' Complaint be dismissed, that all costs of court be taxed against the Plaintiffs, and that Governor Bush and Secretary Cheney receive such other and further relief to which they are justly entitled.

Dated: November 27, 2000.

Respectfully submitted,



Harriet E. Miers

Texas State Bar No. 000000067

Roger B. Cowie

Texas State Bar No. 00783886

Evan E. Fitzmaurice

Texas State Bar No. 24012629

LOCKE LIDDELL & SAPP LLP

2200 Ross Avenue, Suite 2200

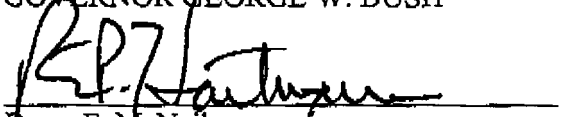
Dallas, Texas 75201-6776

Telephone: 214 740-8000

Facsimile: 214 740-8800

ATTORNEYS FOR

GOVERNOR GEORGE W. BUSH



Barry F. McNeil

Texas State Bar No. 13829500

Robin P. Hartmann

Texas State Bar No. 09168000

Stacy L. Brainin

Texas State Bar No.

HAYNES & BOONE LLP

3100 NationsBank Plaza

Dallas, Texas 75202

Telephone: (214) 651-5000

Facsimile: (214) 651-5940

ATTORNEYS FOR RICHARD B. CHENEY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was served upon the Plaintiffs' counsel and all other counsel of record via telecopier on this the 27th day of November, 2000.



Harriet E. Miers

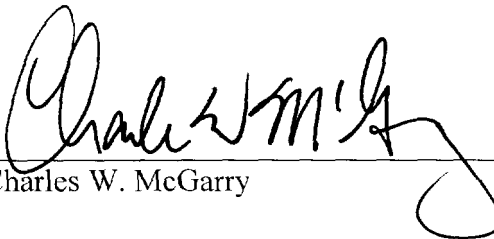
Certificate of Service

This is to certify that on this 29th day of November, 2000, a true and correct copy of the foregoing instrument was delivered to the following counsel of record by hand delivery or facsimile:

Harriet Miers
Locke Liddell & Sapp
2200 Ross Ave., Suite 2200
Dallas, Texas 75201

Barry McNeil
Haynes & Boone
3100 NationsBank Plaza
Dallas, Texas 75202

Hon. John Cornyn
Texas Attorney General
P.O. Box 12548
Austin, Texas 78711



Charles W. McGarry